

# **EXHIBIT D**



**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

JLM COUTURE, INC.,

Debtor.

Chapter 11  
(Subchapter V)

Case No. 23-11659 (JKS)

**DECLARATION OF BETH CHAPMAN IN SUPPORT OF  
HAYLEY PAIGE'S MOTION TO CONVERT THE CASE FROM  
A CHAPTER 11 PROCEEDING TO A CASE PROCEEDING UNDER CHAPTER 7**

I, Beth Chapman, hereby declare under penalty of perjury:

1. I am the owner of – inter alia - Beth Chapman Styling (“BCS”) full-service bridal styling company and the White Dress By the Shore (“WCS”), a bridal store.
2. I have worked in the wedding apparel and related services industry for nearly two decades. As such, I am generally familiar with the practices and exigencies of the wedding industry.
3. I have known Hayley Paige herself for over a decade. We had met when she was still at Priscilla of Boston, prior to her moving to the Debtor (as defined below). I began buying products from the Paige Brands (as defined below) when she moved to the Debtor.
4. WCS has roughly ten (10) different brands of wedding dresses for sale. For several years, wedding apparel made by Hayley Paige (the “Paige Brands”) comprised my highest-selling wedding dresses.
5. It has been my experience that her customers appreciated and even adored the fact that Hayley used social media to truly be the face of a brand. Hayley was happy to have women wear her wedding dresses on the happiest day of their lives and Hayley was invested in the quality of the materials in her dresses. Hayley quickly acquired a reputation as a wedding gown designer



who would surprise brides at weddings when Hayley found out they had purchased a dress from the Paige Brands. This only added to her following and the success of the Paige Brands.

6. Not only was Hayley known for high material quality, the design of her dresses (through the period 2010 through 2018) was known for its innovation. This was enhanced by the social media impact Hayley brought to her brand and the image surrounding the brand.

7. For several years, Paige Brands wedding dresses and products were my highest selling inventory. People coming to my store frequently shopped there specifically for Paige Brands wedding dresses.

8. Unfortunately, over time, I noticed the above-captioned debtor (the "Debtor" or "JLM") had begun to cut corners with fabric and manufacturing quality. I believe this was entirely independent of Hayley Paige and was likely done without her knowledge.

9. The Paige Brands suffered as a result. Sales of Paige Brands products declined significantly and WCS began to have internal debates about whether to drop the Paige Brands as they were taking up retail space that could have been better used for brands without quality issues. Indeed, I began to encounter customers at WCS who had come to WCS out of a desire for a Paige Brands wedding dress, only to find that the quality of the products no longer matched the high end image that Hayley had built.

10. In addition to my role as the owner of WCS, I also founded and manage a collective of wedding professionals, called the White Dress Society ("WDS"), which aims to support professionals in the wedding and bridal space and allow them to share their experiences and seek advice and commentary from their peers in a safe and non-competitive, mutually-assistive community.



11. The members of WDS, and many other professionals and retailers in the wedding and bridal space, were shocked when Hayley Paige announced her separation from the Debtor via Instagram. I later found out about a number of unsavory incidents and allegations involving the owner of the Debtor and the behavior of the CEO of the Debtor towards Hayley Paige from case filings.

12. I was personally shocked to hear about the environment that had developed at the Debtor and I was not alone. Many other professionals in this space experienced similar feelings, particularly due to cryptic comments from the Debtor. JLM only began to communicate at a minimal level with retailers three weeks after Hayley Paige's departure from the company. Prior to the Debtor breaking its silence after her departure, retailers had heard nothing at all for nearly a month, which created problems for retailers with customers unsure of what to expect.

13. The Debtor also did not communicate with buyers well and frequently left me – along with other buyers of Paige Brand products – unsure of the Debtor's direction and corporate strategy.

14. In roughly 2020, it became clear that JLM was not interested in repairing relationships with its buyers and frequently left retailers caught in between consumers and itself due to its failure to communicate with both consumers and retailers. This became even more clear when the Debtor began to blame declining product quality on retailer alterations, including at least one instance where the Debtor claimed that a zipper on a dress that popped off a dress during the bride's wedding was not a manufacturing failure, but the fault of the retailer.

15. These escalating problems, coupled with emerging allegations about mistreatment of Hayley Paige herself, led WCS and other retailers within WDS to determine that they would never do business with JLM again, even if it managed to restructure itself in the above-captioned



Chapter 11 case. The willingness of the Debtor to cut corners in pursuit of short-term potential gains while damaging retailers and their relationships with customers – essentially shifting costs to retailers – has led to widespread distrust of the Debtor and destruction of goodwill between retailers and the Debtor.

16. It is my belief that the Debtor's destruction of its relationship with retailers and the corresponding destruction of the goodwill behind the Paige Brands – as long as they remain under the management of the Debtor – will make any restructuring essentially impossible. Even if the Debtor is able to propose a plan of reorganization (a "Plan") and solicit votes sufficient to receive approval of that Plan, a wide swathe of the industry has refused to purchase from the Debtor – or will refuse to do so in the future. The industry animus towards the Debtor makes going forward as a rehabilitated business nearly impossible, regardless of what a Plan might say. I believe this animus and the associated difficulties are compounded by the litigation between Hayley Paige and the Debtor in the Southern District of New York (the "New York Litigation").

17. I know that the New York Litigation forces a financial burden on the Debtor that it may not be able to continue carrying and this is exacerbated by the aforementioned destruction of goodwill, both with the public and with retailers.

18. As such, it is my belief that there is not viable way for the Debtor to rehabilitate itself and begin seeking new customers.

19. If called to testify on this matter, I would testify competently and truthfully to the above information.

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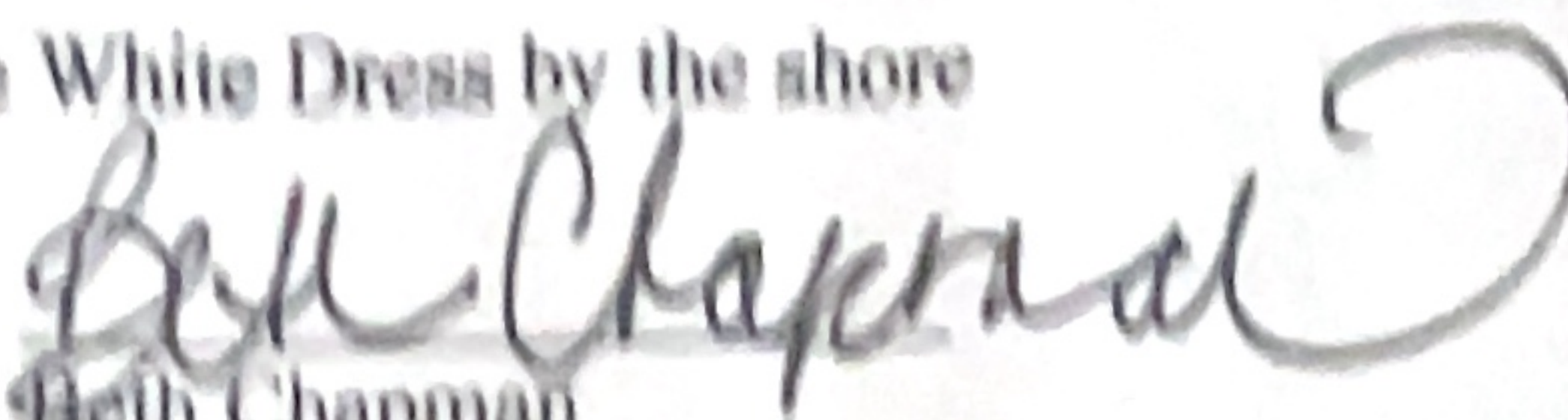


I declare under the penalty of perjury that the foregoing is true and correct.

Executed on April \_\_\_\_, 2024

The White Dress by the shore

By:

A handwritten signature in dark ink, appearing to read "Beth Chapman", written over a horizontal line.

Beth Chapman

Owner